

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Kaylin Eric Johnson

Case: 4:22-mj-30228

Assigned To : Unassigned

Assign. Date : 5/13/2022

CMP: USA v Johnson (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 11, 2022 in the county of Genesee in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 924(c)(1)(a)

*Offense Description*Possession a firearm in furtherance of a drug trafficking
crime

This criminal complaint is based on these facts:

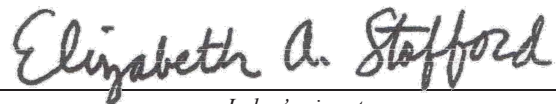
Please see attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 13, 2022

City and state: Detroit, Michigan

*Complainant's signature*Nicholas Daly, Special Agent - DEA*Printed name and title**Judge's signature*Elizabeth Stafford, United States Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL
COMPLAINT**

I, Drug Enforcement Administration agent Nicholas Daly,

being duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. The purpose of this affidavit is to establish probable cause that Kaylin Eric Johnson (DOB: xx/xx/1994) violated 18 U.S.C. § 924(c)(1)(a) (possession a firearm in furtherance of a drug trafficking crime) on or about May 11, 2022, in the Eastern District of Michigan.
2. I am a Special Agent (“SA”) with the Drug Enforcement Administration (“DEA”) assigned to the Detroit Field Division, Flint Resident Office, which is located in Genesee County and in the Eastern District of Michigan. As such, I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(c), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for federal criminal offenses and make requests for warrants. I have been so empowered since October 31, 2016. I have received specialized training on the subject of drug trafficking and money laundering from the DEA. I have additional experience within the law enforcement field as I was employed by the Indiana State Police as a Trooper for about three and a half years. Additionally, I worked as a police officer for the City of Hammond, Indiana Police Department for about one year. In addition to training

received from the DEA, I have been trained by the Indiana State Police Academy, Plainfield, Indiana. I am presently involved in investigating covert and overt drug trafficking complaints. During my employment with DEA, I have received specialized training in and instruction on the subject of drug trafficking from the DEA. I have also participated in numerous confidential source debriefings, defendant interviews, and witness interviews regarding the illegal manufacturing, distribution, and consumption of illegal drugs. I have also participated in numerous investigations involving the manufacturing, transportation, and/or distribution of controlled substances. Furthermore, I have worked in conjunction with other federal and local law enforcement agencies investigating illegal trafficking of controlled substances. Through the combined training and experience I have received as a DEA agent I have become familiar with how drug traffickers distribute drugs.

3. I make this affidavit from personal knowledge based on the following: my participation in this investigation, including witnessing interviews by myself and/or other law enforcement officers, communications with others who have personal knowledge of the events and circumstances described herein, and information gathered through my training and experience. The information outlined below is for the limited purpose of obtaining a criminal complaint and an arrest warrant. I have not

set forth every fact I have learned in this investigation.

Probable Cause

4. On May 11, 2022, at approximately 5:00 p.m., Genesee County Sheriff's Office (GCSO) Deputy David Bennett was driving a fully marked patrol car while assisting GCSO Sgt. Rainwater with a traffic stop for a person driving recklessly by traveling about 60 miles per hour in a 25 mile-per-hour zone and by disregarding stop signs. Sgt. Rainwater gave the vehicle description as a white Chevrolet Blazer, bearing Michigan registration EQA7124.

5. Deputy Bennett saw the Chevrolet Blazer on Grand Traverse Street in the City of Flint, within the Eastern District of Michigan, and activated the overhead lights and sirens of his patrol vehicle to stop the Blazer. Despite Deputy Bennett's patrol vehicle's lights and sirens being activated, the Blazer continued to travel at a high rate of speed before eventually stopping. Once the Blazer stopped, a man carrying a backpack got out and attempted to walk away down an alleyway.

6. Deputy Bennett approached the man, who was later identified as Kaylin Eric Johnson. Deputy Bennett saw Johnson turn towards him with his hands up. Deputy Bennett detained Johnson and asked him what was in the backpack; Johnson replied, "two guns."

7. Deputy Bennett opened the backpack and saw a second, smaller backpack inside that contained two pistols: One black Glock 17, 9 mm pistol, containing a high-capacity magazine with 22 bullets; and one black and silver Smith and Wesson, 9 mm SD9VE pistol, containing a magazine with 15 bullets. Deputy Bennett also found the following evidence in the large backpack:

- Several hundred suspected MDMA/Ecstasy pills weighing approximately 349 grams, which later field tested positive for methamphetamine (MDMA/Ecstasy) using a Mistral Group (Test kit #164) test kit;
- A clear plastic baggie containing suspected crystal methamphetamine weighing about 21 grams, which later field tested positive for methamphetamine or MDMA (Ecstasy) using a using a Nik public safety test kit;
- Three clear plastic baggies containing suspected cocaine weighing about 15 grams, which later field tested positive for cocaine using a Mistral Cocaine Wipe;
- Two digital scales; and
- Approximately \$7,453 in U.S. currency, of which a large portion was later determined to be fake. Fewer than \$300 is estimated to be actual U.S. currency.

8. Sgt. Rainwater detained the Blazer's driver at the scene of the traffic stop. The driver told Sgt. Rainwater that she observed the patrol vehicle's lights as it was attempting to stop her, but she wanted to get Johnson out of the vehicle and hidden from police officers.

9. On May 12, 2022, GCSO Deputy Duhart and I interviewed Kaylin Johnson at the Genesee County Jail. Before questioning him, Deputy Duhart advised Johnson of his *Miranda* rights, which were read from a Genesee County Sheriff's Office advice of rights form. Johnson signed the form acknowledging his rights and agreed to speak with investigators. During the interview, Johnson admitted that everything in the backpack belonged to him, which he acknowledged included two firearms, about 20 grams of methamphetamine, an unspecified amount of cocaine, and an unspecified quantity of Ecstasy pills. Johnson stated that he purchased both firearms from an unknown individual in Flint.


10. On May 12, 2022, I reviewed Johnson's criminal history through a law enforcement database and learned that he has a 2013 felony conviction for carjacking and a 2017 felony conviction for larceny in a building.

11. Based upon my training and experience, the total amount of pills, cocaine, and crystal methamphetamine, combined with the two digital scales, cash, and guns, shows an intent to distribute these controlled substances.

Conclusion

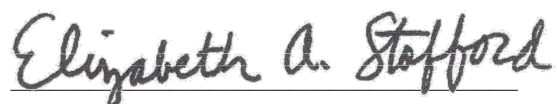
12. Based on the above, there is probable cause to believe that Johnson possessed various controlled substances for the purpose of distributing them in violation of 21 U.S.C. § 841(a). While doing so, he had loaded firearms strategically located near the controlled substances, and the likely proceeds from narcotics sales, for quick and easy use to protect his supply of drugs. Because he is a convicted felon, his possession of the firearms was also illegal. Based on all of this, there is probable cause to believe that Johnson likely possessed a firearm in furtherance of a drug trafficking offense, in violation of 18 U.S.C. § 924(c)(1)(a), on May 11, 2022, in the Eastern District of Michigan.

Respectfully submitted,



Nicholas Daly
DEA Agent

Sworn to before me and signed in my presence and/or by
reliable electronic means on May 13, 2022.



Elizabeth Stafford
United States Magistrate Judge